

Message

From: Barrientos, Brittany A. [brittany.barrientos@stinson.com]
Sent: 9/14/2022 5:19:11 PM
To: HertzWu, Sara [HertzWu.Sara@epa.gov]
CC: Ellis Johnson, Kristen M. [kristen.johnson@stinson.com]
Subject: RE: BCP Verona Order on Consent

Yes. Thanks. Let us know if you want to do a Teams or a call.

Brittany A. Barrientos

Partner
Pronouns: She/Her

STINSON LLP
1201 Walnut Street, Suite 2900
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From: HertzWu, Sara <HertzWu.Sara@epa.gov>
Sent: Wednesday, September 14, 2022 12:05 PM
To: Barrientos, Brittany A. <brittany.barrientos@stinson.com>
Cc: Ellis Johnson, Kristen M. <kristen.johnson@stinson.com>
Subject: RE: BCP Verona Order on Consent

Would 1:30 pm work?

From: Barrientos, Brittany A. <brittany.barrientos@stinson.com>
Sent: Wednesday, September 14, 2022 11:34 AM
To: HertzWu, Sara <HertzWu.Sara@epa.gov>
Cc: Ellis Johnson, Kristen M. <kristen.johnson@stinson.com>
Subject: RE: BCP Verona Order on Consent

Thanks Sara. Any chance you have other availability than 11? If not, we understand the time crunch here and will make it work, but we have a BCP team call during that time and will have better information after. Let us know what works. Thanks.

Brittany A. Barrientos

Partner
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From: HertzWu, Sara <HertzWu.Sara@epa.gov>
Sent: Wednesday, September 14, 2022 9:17 AM
To: Barrientos, Brittany A. <brittany.barrientos@stinson.com>
Cc: Ellis Johnson, Kristen M. <kristen.johnson@stinson.com>
Subject: RE: BCP Verona Order on Consent

Brittany: We are available tomorrow at 11. Does that work for you? We can also discuss the FOIA.

Sara

From: Barrientos, Brittany A. <brittany.barrientos@stinson.com>
Sent: Wednesday, September 14, 2022 7:57 AM
To: HertzWu, Sara <HertzWu.Sara@epa.gov>
Cc: Ellis Johnson, Kristen M. <kristen.johnson@stinson.com>
Subject: RE: BCP Verona Order on Consent

Sara:

We've reviewed the document and I think we're really close. Do you have time tomorrow afternoon or Friday to discuss the corrective action timelines? I believe there are three that BCP would like to discuss (the ventilation study, SOP updates, mechanical integrity program). Please let us know if there's a time that works.

Also, as it relates to the FOIA question last week, BCP's CBI claims did not encompass the attachments with the caveat that we have only seen the photos provided in the 15MB Attachment 1 Photo Log (17-slide .ppt) sent to BCP. If there are other photos that will be provided, BCP requests the opportunity to review those to confirm confidentiality. Also, as you know, BCP has not received Attachment 4 (EPA's inspection checklist). In the event Attachment 4 will be provided as part of the FOIA response, BCP requests a copy.

Thank you.

Brittany

Brittany A. Barrientos
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From: HertzWu, Sara <HertzWu.Sara@epa.gov>
Sent: Friday, September 9, 2022 10:12 AM
To: Barrientos, Brittany A. <brittany.barrientos@stinson.com>
Cc: Ellis Johnson, Kristen M. <kristen.johnson@stinson.com>
Subject: BCP Verona Order on Consent

External Email – Use Caution

Brittany: Attached please find EPA's response to BCP's redline of the AOC. We were able to accept some of the revisions and I tried to note in the document where we would not be accepting the revisions or why we added certain language. In some instances I did leave the redline in so you could see all of the revisions to a particular paragraph.

Please let me know if you have questions or would like to discuss. We are still hoping to have this finalized by September 19.

Regards,

Sara Hertz Wu
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